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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THOMAS R. LAYTON, an individual

Plaintiff,

v.

SPECIALIZED LOAN SERVICING, LLC, a
Delaware limited liability company d/b/a SLS,

Defendant.

Case No. 2:20-cv-01225-JAD-EJY

**DEFENDANT'S MOTION ~~AND~~
~~PROPOSED ORDER~~ TO EXTEND TIME
TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT AND SET BRIEFING
SCHEDULE

(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule IA 6-1, Defendant Specialized Loan Servicing, LLC ("SLS"), by and through its counsel, the law firm of GREENBERG TRAUIG, LLP, hereby requests that this Court grant it an extension of time up to and including July 31, 2020, to answer or otherwise respond to Plaintiff Thomas R. Layton's ("Plaintiff") Complaint. SLS also requests the Court set a briefing schedule on any motion SLS may file in response to the Complaint, as detailed below. In further support of this Motion, SLS states as follows:

1. Plaintiff filed a putative Class Action Complaint ("Complaint") against SLS in the Eighth Judicial District Court for the State of Nevada in the above-captioned action on May 27, 2020.
2. Plaintiff served the Complaint on SLS on May 29, 2020.
3. On June 29, 2020, SLS removed the matter to this Court pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1332(d).

1 4. Pursuant to Fed. R. Civ. P. 81(c)(2), the deadline for SLS to respond to the Complaint
2 is July 6, 2020.

3 5. SLS has only recently retained counsel and requires additional time to review
4 Plaintiff's Complaint and the issues in dispute, particularly in light of the impacts of COVID-19.

5 6. To that end, counsel for Plaintiff and SLS conferred and had preliminarily agreed to
6 coordinate a continued response deadline and a briefing schedule. However, due to circumstances
7 impacting Plaintiff's counsel's ability to meet-and-confer to finalize a stipulation, the parties were
8 not able to finalize and submit a stipulation and proposed order by today's statutory response
9 deadline.¹ SLS fully anticipates the parties being able to submit a stipulation as soon as possible,
10 though it will not be before the initial response deadline pursuant to Fed. R Civ. P. 81. As such, to
11 avoid any potential issues with waiver and preserve the anticipated extension and briefing schedule,
12 SLS makes this stipulation to extend SLS's deadline to respond to the Complaint from July 6, 2020
13 to July 31, 2020.

14 7. Additionally, given that SLS presently anticipates filing a motion in response to
15 Plaintiff's Complaint, SLS requests the following briefing schedule:

16 a. Deadline for SLS to respond to the Complaint: July 31, 2020;

17 b. Deadline for Plaintiff to file his opposition to any SLS motion: August 31, 2020;

18 c. Deadline for SLS to file its reply to Plaintiff's opposition: September 18, 2020.

19 8. This requested extension of time to respond to the Complaint will not prejudice
20 Plaintiff, nor will it unduly delay the timely disposition of this matter. Indeed, this Motion seeks to
21 ensure the efficient and proper use of judicial resources by allowing adequate time to review the
22 allegations in the Complaint and prepare an appropriate response.

23 9. This is SLS's first request and there have been no prior requests before this Court or at
24 the state court. This request is made in good faith and not for the purpose of delay.

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28 ¹ Given the nature of these circumstances and out of respect for counsel's privacy, SLS will not provide further detail at this time.

10. It is not anticipated that Plaintiff's counsel will have any objection to SLS's request and, if possible, the parties will endeavor to submit a stipulation before the Court adjudicates this motion.

DATED this 6th day of July, 2020.

GREENBERG TRAURIG, LLP

/s/ *Jacob D. Bundick*

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ORDER

Based upon the above and foregoing,

IT IS SO ORDERED.

DATED this 7th day of July, 2020.

Elayna J. Zouchak
UNITED STATES MAGISTRATE JUDGE